

Appl. No. : 10/672,906
Filed : September 25, 2003

REMARKS

Applicant respectfully requests reconsideration of the application in view of the remarks set forth below. No amendments to the claims have been made.

Discussion of Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner has rejected Claims 1-6 under 35 U.S.C. § 103 (a) as being unpatentable over Applicant's admitted prior art (AAPA) in view of Tsubo (U.S. Patent No. 6,831,295). Applicant respectfully submits that all pending claims are allowable over the cited prior art as discussed below.

Standard of Prima facie Obviousness

In order to provide a *prima facie* showing of obviousness under 35 U.S.C. § 103, all the claim limitations must be taught or suggested by the prior art. *See, e.g., In re Royka*, 490 F. 2d 981, 180 U.S.P.Q. 580 (CCPA 1974); MPEP 2143.03.

Discussion of Patentability of Independent Claim 1

Independent Claim 1 recites, among other things, that each pixel electrode is divided into a plurality of sub pixel electrodes, and at least a portion of each metal line is located between adjacent sub pixel electrodes. Applicant respectfully submits that the above-indicated features of the claimed invention are neither taught nor suggested by the cited prior art.

1. Neither AAPA nor Tsubo teaches or suggests “each pixel electrode is divided into a plurality of sub pixel electrodes, and at least a portion of each metal line is located between adjacent sub pixel electrodes” recited in Claim 1

AAPA does not disclose the above-recited features of the claimed invention. AAPA discloses a single pixel electrode (308) in each pixel region. *See Figures 2A-2C of this application*. Since AAPA teaches only one pixel electrode (308) in each pixel region, AAPA cannot, and does not, teach “each pixel electrode is *divided into a plurality of sub pixel electrodes*, and at least a portion of each metal line is *located between adjacent sub pixel electrodes*” recited in Claim 1. Furthermore, AAPA does not teach “a plurality of metal lines located on said first substrate and expanded from said plurality of common electrode lines”

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recited in Claim 1. The Examiner has acknowledged as such in this Office Action. *See the final Office Action at page 3, second paragraph.* Thus, Applicant respectfully submits that AAPA does not teach or suggest all of the features of the claimed invention.

Tsubo does not teach or suggest the above-indicated features recited in Claim 1. Tsubo discloses a single pixel electrode (13) in each pixel region. *See Figures 5, 6A-6C, 7-9, 10A-10B and 11-14 of Tsubo.* Again, since Tsubo teaches only one pixel electrode (13) in each pixel region, the Tsubo reference cannot, and does not, teach “each pixel electrode is *divided into a plurality of sub pixel electrodes*, and at least a portion of each metal line is *located between adjacent sub pixel electrodes*” recited in Claim 1. *See Figures 11 and 13 of Tsubo.*

The Examiner asserts that in Figure 14, the pixel electrode (13) is divided into a plurality of sub pixel electrodes (portion above the line 28 and portion below the line 28), and at least a portion of each metal line (28) is located between adjacent sub pixel electrodes. *See the final Office Action at page 5, first paragraph.* Applicant respectfully disagrees. Tsubo teaches that:

Referring to FIG. 14, a TFT-LCD device according to an eighth embodiment of the present invention is similar to the seventh embodiment except that the common line 27 crosses the pixels 11 at the central portions thereof, the shield ring 17 is of a flat plate having a pair of openings 29 within the area for the pixel electrode 13 and outside the area for the common lines 27, and the through-hole 24 for connecting the pixel electrode 13 and the shield ring 17 is disposed in the vicinity of the TFT 12.

See column 8, lines 19-27 of Tsubo

In view of the above, Applicant respectfully submits that the portion (29) above the line (28) and the portion (29) below the line (28) are openings (29) which are provided in the shield ring (17). That is, those openings (29) are not formed in the pixel electrode (13) but in the shield ring (17). This means that the pixel electrode (13) is not divided into a plurality of sub pixel electrodes. Furthermore, Applicant respectfully submits that the large width expansion (28) of the common line (27), characterized by the Examiner to correspond to the claimed metal line, is not, and cannot be, *located between adjacent sub pixel electrodes* because Tsubo does not teach a plurality of sub pixel electrodes. In view of the above, Applicant respectfully submits that Tsubo does not teach or suggest “each pixel electrode is divided into a plurality of sub pixel

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electrodes, and at least a portion of each metal line is located between adjacent sub pixel electrodes” recited in Claim 1.

2. Combination of AAPA and Tsubo Does Not Teach the Above-Recited Features of the Claimed Invention

As discussed above, neither AAPA nor Tsubo teaches or suggests “each pixel electrode is *divided into a plurality of sub pixel electrodes*, and at least a portion of each metal line is *located between adjacent sub pixel electrodes*” recited in Claim 1. Thus, even if AAPA and Tsubo were combined, Applicant respectfully submits that the combination does not teach the above-recited features of the claimed invention. In view of the above, Applicant respectfully submits that independent Claim 1 is allowable over AAPA and Tsubo.

Discussion of Patentability of Dependent Claims

Claims 2-6 depend from base Claim 1, and further define additional technical features of the present invention. In view of the patentability of their base claim, and in further view of their additional technical features, Applicant respectfully submits that the dependent claims are patentable over the prior art of record.

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CONCLUSION

In view of Applicant's foregoing remarks, it is respectfully submitted that the present application is in condition for allowance. Should the Examiner have any remaining concerns which might prevent the prompt allowance of the application, the Examiner is respectfully invited to contact the undersigned at the telephone number appearing below.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: _____

3/29/06

By: _____

John M. Carson
Registration No. 34,303
Attorney of Record
Customer No. 20,995
(619) 235-8550

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